

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

GORDON D. SONDLAND,)	
)	
)	
Plaintiff,)	
)	No. 21-2083C
v.)	(Judge Smith)
)	
UNITED STATES,)	
)	
Defendant.)	

JOINT STATUS REPORT

Pursuant to the Court's June 3, 2024 order, plaintiff, Gordon D. Sondland, and defendant, the United States, respectfully submit this joint status report proposing next steps following the conclusion of fact discovery.

The United States intends to file a motion for summary judgment, which plaintiff will oppose. Accordingly, the parties propose the following schedule:

September 27, 2024: Defendant's deadline to file a motion for summary judgment;

October 25, 2024: Plaintiff's deadline to file a response to defendant's motion; and

November 15, 2024: Defendant's deadline to file a reply in support of its motion for summary judgment.

The parties respectfully request that the Court enter the deadlines as set forth above and to set this matter for trial in the first quarter of 2025, pending the disposition of the defendant's motion.

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney
General

PATRICIA M. McCARTHY
Director

s/Steven J. Gillingham
STEVEN J. GILLINGHAM
Assistant Director

s/William J. Grimaldi
WILLIAM J. GRIMALDI
Assistant Director
GEOFFREY M. LONG
Senior Trial Counsel
JOSHUA W. MOORE
KELLY GEDDES
Trial Attorneys
Commercial Litigation Branch
Civil Division, Department of Justice
P.O. Box 480
Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 616-0471
E-mail: william.j.grimaldi@usdoj.gov

OF COUNSEL:

MICHAEL ZUBROW
Attorney-Advisor
Office of the Legal Adviser
U.S. Department of State

Attorneys for Defendant

Dated: September 4, 2024

s/Mark A. Barondess
MARK A. BARONDESS
MILLER BARONDESS LLP
2121 Avenue of the Stars
26th Floor
Los Angeles, CA 90067
Telephone: (310) 552-4400
Facsimile: (310) 552-8400
Email: mbarondess@millerbarondess.com

Attorneys for Gordon D. Sondland